
 <p>GROUP POLICY – RESPONSIBLE ARTIFICIAL INTELLIGENCE</p>	Effective date: 19 February 2024
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1. Definitions

1. “Artificial Intelligence” or “AI” means a machine-based system that, for explicit or implicit objectives, infers, from the input it receives, how to generate outputs such as predictions, content, recommendations, or decisions that (can) influence physical or virtual environments. Different AI systems vary in their levels of autonomy and adaptiveness after deployment.

2. “AI system” means a range of software-based technologies that encompasses 'machine learning', 'logic and knowledge-based' systems, and 'statistical' approaches.

3. “AI Use Case” means a specific scenario where an AI system (either developed in-house or purchased from an external supplier) is leveraged to address a business challenge or problem or enhance an existing process. Each AI Use Case is aligned with TAG’s strategic goals and includes a detailed description of the problem or opportunity, an explanation of how AI can be utilized, the expected business value outcome (e.g., efficiency gains, cost savings, or revenue increase), and the data requirements. AI Use Case is the foundation of TAG AI use.


4. “AI Use Case manager” means the specific person from the Staff who holds final responsibility for the purchase, development, implementation and/or use of a given AI Use Case in TAG operations.

5. “RAIC Chair” means one of the members of the RAIC as defined below appointed as its Chair.

6. “Records” means all the documentation related to the AI Use Case. This includes the technical documentation, questionnaires, assessments, relevant follow-up communication between the Use Case manager and the Responsible AI manager or Responsible AI Committee; and any decisions made with regards to the purchase, development, implementation, or use of AI.

7. “Responsible AI Committee” or “RAIC” means a committee of the Adecco Group established with the purpose to ensure the Adecco Group’s purchase, development, implementation and use of AI aligns with its commitment to Responsible AI described in the Responsible AI Principles defined below.

8. “Responsible AI Principles” means the principles attached herein as Annex 1 that reflect the overall commitment of TAG to responsible AI.

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9. “AI Governance Standard” means the document setting out procedural elements relating to TAG governance of AI Use Cases, including the initial Responsible AI assessment as well as the periodic review.

10. “Staff” means all colleagues and associates (i.e. temporary staff) employed or engaged by members of the Adecco Group as well as any of its directors and officers and individual contractors of members of the Adecco Group.

11. “The Adecco Group” or “TAG” collectively means Adecco Group AG, its business divisions, subsidiaries, and affiliated companies throughout the world. This also includes those joint ventures in which Adecco Group, directly or indirectly, has either majority ownership or management control. The terms “we”, “us”, or “our” refer to the Adecco Group.

2. Scope and Applicability

1. This Policy describes the requirements for the purchase and/or development, implementation and use of AI technologies within TAG. This Policy also defines the assessment and governance for AI Use Cases, enabling appropriate oversight of AI, in compliance with the TAG Responsible AI Principles.

2. It provides a uniform minimum standard, and it applies to all Staff worldwide.


3. Exceptions to this Policy are only permitted where applicable law allows and must be approved in writing by the Chair of the RAIC.

4. Access to remedy procedures for those who believe they are the victim of wrongful use of AI by the Adecco Group and its representatives is detailed in the Adecco Group Code of Conduct¹.

5. The Board of Directors of Adecco Group AG has oversight authority over the processes described in this Policy. Its Governance and Nominations Committee performs this authority.

6. This Policy is administered by the Group Responsible AI manager, under the supervision of the Chair of the RAIC.


¹ <https://adeccogroup.com/our-group/about-us/code-of-conduct/>

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3. Responsible AI requirements

3.1 Ethical and Human Centric AI

1. All Staff are responsible for making ethics one of the guiding principles that guides their acquisition and/or development, implementation and use of AI technologies.
2. Project teams are required to record the participation and input of relevant stakeholders throughout the entire lifecycle of these AI technologies. This includes roles during and post-deployment (troubleshooting, management, operation, supervision).
3. Project teams are tasked with ensuring that stakeholders comprehend the system’s intended use, the method of interaction with the system, the interpretation of the system’s results and behavior, the circumstances, and methods for overriding, intervening, or interrupting the system, and the avoidance of over-reliance on the system’s output.
4. Project teams are responsible for establishing and recording specific criteria for responsible implementation of the AI Use Case.
5. Project teams are obliged to ensure the appropriate level of human intervention with the AI system and make a record of this.
6. To acknowledge the implications of bias and to apply inclusive AI practices that prioritize diversity and accessibility, project teams will:
 - a. Adhere to the AI Governance Standard.
 - b. Implement measures to prevent end-users from over-relying on the AI system.
 - c. Develop measures to prevent the system from unintentionally impacting human autonomy or causing other undesirable adverse effects.
 - d. Establish procedure(s) to ensure the diversity and representativeness of datasets by defining and recording data requirements in relation to the system’s intended use, stakeholders, geographic areas, and procedures for data collection and processing (including annotation, labeling, cleaning, enrichment, and aggregation, where relevant). This also includes the assessment of the quantity and suitability of datasets, and methods for evaluating the data against requirements.

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- e. Conduct tests to detect the creation or reinforcement of unfair bias in the AI system’s output, as well as system behavior and security.
- f. Consider and record the short-term and long-term social impacts (e.g., impact on employment levels, job quality, access to information, economic opportunity, etc.) where possible.

3.2 Transparent use of AI

1. The project teams are tasked with implementing design methodologies that inform the end user of their direct interaction with an AI system in advance.
2. In the design of the AI system the project teams ensure that the user experience (UX), features, reporting functions, and educational materials are being designed with consideration for the respective internal and external stakeholder groups.
3. The project teams are committed to ensuring that the AI system provides clarity, transparency, and comprehensibility of the process which leads to a certain outcome. This is achieved through the documentation of the methods employed in the design and development of the AI system.
4. The project teams are obliged to keep the documentation regarding an AI Use Case up to date on a regular basis or whenever changes are developed and deployed.

3.3 Safe use of AI

1. All Staff are obliged to comply with the IT Security Governance Framework.


3.4 Lawful Use of AI

1. All Staff are obliged to comply with applicable laws, regulations and Group Policies and Governance Frameworks.

4. Initial responsible AI assessments

4.1 Assessments and record keeping of AI Use Cases

1. Each AI Use Case will be subject to initial responsible AI assessments which include a self-assessment (section 4.2.), a deep dive assessment where necessary (section 4.3.), and potentially a further assessment by the RAIC (section 4.4.). Procedural aspects are described in section 4 and further detailed in the AI Governance Standard.

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2. As set out in section 5, further assessments will be performed periodically and during the lifespan of the AI system until it is decommissioned.

3. Development of AI Use Cases may continue during the entire period of the initial responsible AI review, unless indicated otherwise by the Chair of the RAIC.

4. AI Use Cases will not go to production while they are still under review by the Responsible AI manager, the group of experts or the RAIC.

5. Records of the assessments of the AI Use Cases will be stored in the AI portfolio database. All records will be kept in accordance with Group Policy 01.03. (Document Retention) and applicable laws.

4.2 AI self-assessment

1. The AI Use Case manager will perform a mandatory responsible AI self-assessment for each AI Use Case.

2. The AI self-assessment will be reviewed by the Responsible AI manager and the group of experts (e.g., data privacy and data protection, IT security), and will lead to one of the following outcomes:

a. No significant risk perceived: the AI Use Case may continue its development and implementation until the next (periodic) review as specified in section 5.


b. Potential risk: the AI Use Case will be subject to a deep-dive analysis as specified in section 4.3.

c. Unacceptable risk or prohibited use of AI: the AI Use Case will be referred to the RAIC for rejection.

4.3 Deep dive assessment

1. The Responsible AI manager and the group of experts (e.g., data privacy and data protection, IT security) will perform a deep dive assessment which will lead to one of the following outcomes:

a. No significant risk perceived: the AI Use Case may continue its development and implementation until the next (periodic) review.

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b. Potential risk: The AI Responsible AI manager will discuss with the group of experts for potential escalation or mitigating actions.

c. Unacceptable risk/prohibited use of AI: the AI Use Case will be referred to the RAIC for rejection.

4.4 Assessment by the RAIC

2. The RAIC is mandated to be guided by the Responsible AI Principles including its constituent components Ethics, Human-centricity, Transparency, Safety and Lawfulness, in its assessments.

3. The RAIC will jointly determine if an AI Use Case complies with the TAG Responsible AI Principles, and if an AI Use Case is thus fit for release and use within Adecco Group. As such, they may decide to:

a. Approve an AI Use Case development, implementation and/or use until the next (periodic) review.

b. Approve an AI Use Case development and/or implementation subject to conditions. These conditions may limit the relevant AI Use Case to specific scope (e.g. geographic scope, certain types of users, or certain applications).

c. Fully or partially reject an AI Use Case.

4. The members of the RAIC will take decisions by two-thirds majority.


5. Decisions of the RAIC will be final.

4.5 Timelines

1. The Responsible AI manager, the group of experts and the RAIC will adhere to strict timelines when reviewing and assessing AI Use Cases. Exact timelines are set out in the AI Governance Standard.

5. AI Use Case review

1. Once an AI Use Case has gone through the initial assessment as described in Section 4, it will be subject to periodic review during the lifespan of the relevant AI system and until it is decommissioned. Details are set out in the AI Governance Standard.

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2. A review will be required when an AI Use Case undergoes any technical changes, or changes in the way it interacts with users.

3. In case a significant risk is identified, the Chair of the RAIC might suspend the use of an AI Use Case and request the full RAIC to review the AI Use Case which will be done within two weeks from the start of the suspension.

4. The RAIC will have the ability to suspend the use of an AI Use Case until mitigating actions have been taken, or to stop its use altogether.

6. The Adecco Group Responsible AI Committee

1. The RAIC’s tasks, responsibilities, organization and composition are specified in the RAIC Charter.

7. Reporting to TAG Board, management and other stakeholders

1. The Responsible AI manager will provide a quarterly report to the RAIC, unless otherwise agreed by the parties involved.

2. The Chair of the RAIC will provide a quarterly report to TAG Executive Committee and the Governance and Nominations Committee of TAG Board of Directors, unless otherwise agreed by the parties involved.


3. TAG will provide an update on the work of the RAIC in its Annual Report and communicate to other stakeholders as required.

8. Cross-Reference to other Policies

1. This Policy should be read in conjunction with TAG Code of Conduct and any other relevant group policies including but not limited to those on Information Security, Data Protection, Intellectual Property, Human and Labour Rights.


9. Approval and Amendment

1. This Policy was approved by the Governance & Nominations Committee of the Board of Directors of Adecco Group AG.

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2. AI Use Cases already implemented at the effective date set out in the header of this Policy shall have six (6) months to adhere to the requirements set out in this Policy.

3. TAG may update this Policy as necessary to reflect changes in law, regulatory guidance and/or business practices and to ensure it remains fit for purpose. Changes to this Policy will be notified to Staff via the regular channels.

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Annex 1 - The Adecco Group Responsible AI Principles

These Principles are guided by our purpose as a company, our core values, and our commitment to sustainable and responsible business conduct. These Principles apply to all the AI technologies that the Adecco Group uses and develops. As such, these Principles add to but do not replace existing policies on issues such as Information Security, Data Protection, Intellectual Property, and the Group Code of Conduct.

We aim to look beyond what is legally required with respect to the use and development of AI technologies and to base our analysis and decisions on what we believe to be ethical, inclusive and fair, whereby we actively seek input from diverse stakeholders. This reflects the Group’s values, most notably the value of “Inclusion” and “Customer at the Heart”. We aim to always act with integrity and accountability, and we demand the same from any third parties working with us.

We are active participants in discussions on AI in society, particularly in the context of the world of work, and we work closely with policymakers to support regulation that enables responsible use of AI.

Our end goal is to achieve a Responsible use and development of AI within the Adecco Group. Responsible means that we adhere to 5 Principles:

1. Ethical
2. Human-Centric
3. Transparent
4. Safe
5. Lawful


Our use and development of AI technologies will be:

1. Ethical

Ethics is at the heart of who we are and is the overarching principle in our approach to the use and development of AI technologies.

We recognize the grave consequences of bias, ranging from the marginalization of vulnerable communities to reinforcing prejudice and discrimination. To counter this, we apply as well as advocate for inclusive AI practices that prioritize diversity and accessibility, ensuring the involvement and consideration of relevant stakeholders across the entire lifespan of these technologies.

We aim for both data equity (input) as well as output equity with data equity including both representation and feature equity and output equity, striving for impartial and fair

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results². Whenever data equity cannot be ensured (e.g. due to technological or other constraints), outcome equity will be controlled even more rigorously.

We always aim to have a human in the decision-making loop, particularly in AI systems used in HR processes such as recruitment or selection, promotion, termination of employment, for task allocation and for monitoring and evaluating performance.

2. Human-centric

We ensure that the AI systems we develop and use will neither cause nor exacerbate harm. This entails the protection of human dignity as well as mental and physical integrity. AI systems should benefit all human beings, including future generations. We actively seek to take into account intercultural and language differences in using, developing and assessing AI systems.

We will thus ensure that AI systems we deploy and utilize are sustainable, carefully considering the potential social, societal and environmental impacts, risks and opportunities, including in the choice of partners and the way we build and use our solutions.

3. Transparent


Transparency is essential for promoting understanding, trust, fairness and accountability, and should be translated in clarity, openness, and understandability of the processes involved in developing and using AI systems. We communicate openly and clearly using easy to understand language about the use of AI to all individuals impacted by AI systems (e.g., employees, candidates, and associates). We clearly describe the capabilities, benefits, intended purpose, limitations, and the data used by such technologies, and provide simple explanations for any automated outcomes and decisions made. We ensure that we allow the possibility to offer human intervention so that the decision criteria and output of the AI system can be reasonably understood, challenged and validated by humans.

This starts by letting the end user know in advance when they interact directly with an AI system. We also prioritize the use of simpler, easier to explain models wherever this is possible without compromising their effectiveness.

4. Safe.

We will ensure that the data, AI systems, and the environments in which they are stored and operate are safe and secure, they will be technically robust. We ensure a quality management and risk management system is in place to govern the development and use of AI systems across their lifecycle.

² See Annex 1 for further details.

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Concretely, this means:

- We ensure the AI technologies we deploy are safe to use and ensure those technologies do not go beyond the original purpose of their design.
- Assure market-leading Information Security standards are used to secure data inputs and outputs of AI technologies.
- Maintain oversight and control of AI technologies throughout their lifecycle.
- Undertake best efforts to eliminate or reduce any potential risks associated with each respective AI system for our employees, candidates, associates and clients.
- Remain vigilant for areas of critical concern and stay up to date on the newest developments in the AI domain.
- Create AI systems that are resilient and secure, ensuring a fallback plan in case of detected misuse or incidents

5. Lawful.

- We ensure that the development and use of AI technologies complies with all applicable laws, including but not limited to data protection and privacy laws, anti-discrimination laws, intellectual property laws, and legislation specific to AI.
- We take steps to identify and remove actual or potential bias and discrimination from data sets and algorithms to ensure that the use of artificial intelligence technologies is fair to users and does not unjustly impact people based on sensitive characteristics including race, ethnicity, gender, nationality, sexual orientation, disability, and political or religious belief.
- We are accountable for the governance of our AI technologies and insurance of a continuous quality management of operationalized AI solutions.
- We ensure that the use of Artificial Intelligence technologies respects the fundamental human rights of individuals as set out in the Universal Declaration of Human Rights and the EU Charter of Fundamental Rights, and we are guided by the UN Guiding Principles for Business and Human Rights and the UN Global Compact as well as the ILO Declaration on Fundamental Principles and Rights at Work.